

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ING BANK N.V.,	§	
	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO.
	§	ADMIRALTY
	§	
NATIONAL SHIPPING	§	
COMPANY OF SAUDI ARABIA	§	
(a.k.a. "BAHRI")	§	
	§	
Defendant	§	

**MOTION AUTHORIZING ISSUANCE OF A WRIT OF ATTACHMENT AND
GARNISHMENT PURSUANT TO SUPPLEMENTAL ADMIRALTY RULE B**

NOW COMES, plaintiff, ING Bank N.V. ("ING"), through undersigned counsel, and upon suggesting to the Court that the Verified Complaint and Rule B Declaration under Penalty of Perjury filed herein set forth conditions for maritime process of attachment of the M/V BAHRI YANBU, IMO No. 9626534, and her engines, tackle, equipment, furniture, appurtenances, etc., hereafter the "BAHRI YANBU", and any other property of defendant National Shipping Company of Saudi Arabia (a.k.a. "Bahri"), hereafter "NSCSA", on board said vessel or within this District, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, and that, accordingly, ING is entitled to an Order authorizing the attachment and garnishment of the BAHRI YANBU, and all other of defendant's property or assets onboard said vessel or within this District.

Pursuant to the Local Rules of this Court, ING agrees to release and hold harmless and indemnify the United States of America, the United States Marshal, their agents, servants, employees, and all others from whom they are responsible, from any and all liability or

responsibility for claims arising from the attachment of the aforesaid BAHRI YANBU, and all property of NSCSA aboard that vessel or located within this District.

WHEREFORE, ING Bank N.V. requests this Court to enter an Order authorizing the attachment and garnishment of BAHRI YANBU, and all other of defendant's property or assets onboard said vessel or within this District.

Respectfully submitted:

/s/ Joseph R. Messa

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